

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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Receiv. P. D. Tello  
U.S. DIST. CT.  
MEMPHIS  
02-200580 A

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
FLORENCE BROOKS, TINA WADDLES, )  
KEVA WADDLES, REGINALD )  
SIMMONS, LATRICE PEARSON, )  
STEPHANIE BROOKS, WILLIE )  
HUDSON, NATOSHIA ALSTON, )  
HENRY PERDUE, ANJANET HUDSON, )  
TERRANCE STEVENSON, TOYA )  
MAXWELL, FREDERICK JACKSON, )  
PRECIOUS THOMPSON, DELORIS )  
PAMPLEY, TARA FLEMING, and )  
APRIL LOGAN, )  
 )  
Defendants. )

CRIMINAL No. \_\_\_\_\_

18 U.S.C. § 2  
18 U.S.C. § 371  
18 U.S.C. § 513  
18 U.S.C. § 1028(a)(7)  
18 U.S.C. § 1029(a)(5)

I N D I C T M E N T

THE GRAND JURY CHARGES:

COUNT ONE

Beginning on or about October 5, 2000, and continuing to on or about June 6, 2001, in the Western District of Tennessee, the defendants,

----- FLORENCE BROOKS, TINA WADDLES, -----  
----- KEVA WADDLES, REGINALD SIMMONS, -----  
----- LATRICE PEARSON, STEPHANIE BROOKS, -----  
----- WILLIE HUDSON, NATOSHIA ALSTON, -----  
----- HENRY PERDUE, ANJANET HUDSON, -----  
----- TERRANCE STEVENSON, TOYA MAXWELL, -----  
----- FREDERICK JACKSON, PRECIOUS THOMPSON, -----  
----- PRECIOUS THOMPSON, DELORIS PAMPLEY, -----  
----- TARA FLEMING, and APRIL LOGAN, -----

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did unlawfully, willfully, and knowingly, combine, conspire, confederate, and agree with one another and with persons known and unknown to the Grand Jury, to violate the laws of the United States of America, to wit:

1. Title 18, United States Code, Section 1708, which prohibits the possession of stolen mail; Title 18, United States Code, Section 1344, which prohibits bank fraud; Title 18, United States Code, Section 513(a), which prohibits possessing, receiving, and possessing counterfeit securities; and, Title 18, United States Code, Section 1028(a)(7), which prohibits the use of the means of identification of another person.

**OBJECT OF THE CONSPIRACY**

The object of the conspiracy, confederation, combination, and agreement was for the defendants to achieve a common goal, that is: to profit from the use of stolen and counterfeit checks. It was a part of the conspiracy that individuals would steal and obtain personal checks, bank account information, and identification documents through: employment with Federal Express Corporation; employment with the United States Postal Service; motor vehicles; employment with private corporations; and, thefts in classrooms and from mail boxes. It was further part of the conspiracy that the individuals would sell the personal checks and documents to **FLORENCE BROOKS** and **TINA WADDLES**. It was further part of the conspiracy that **FLORENCE BROOKS** would counterfeit business checks. It was further part of the conspiracy that **TINA WADDLES** would produce identification documents that appeared to have been issued

by local and state agencies. It was further part of the conspiracy that individuals would purchase and alter novelty identification documents. It was further part of the conspiracy that **FLORENCE BROOKS** would contract with various individuals to pass the stolen and counterfeit checks using fraudulent identification documents at various financial institutions and merchants. In furtherance of the conspiracy and to effect the objects of the conspiracy, at least one of the co-conspirators committed at least one of the following overt acts in the Western District of Tennessee and elsewhere:

**Overt Acts**

1. Between on or about October 1, 2000 and continuing to on or about October 19, 2000, **FLORENCE BROOKS** counterfeited securities in the form of business checks of various companies.

2. Between on or about October 5, 2000 and continuing to on or about March 14, 2001, the defendant **REGINALD SIMMONS** and others known and unknown to the Grand Jury stole boxes and books of checks through his employment with Federal Express Corporation.

3. Between on or about October 1, 2000 and continuing to on or about April 30, 2001, the defendant **TERRANCE STEVENSON** stole personal checks and identification documents from motor vehicles and other sources known and unknown to the Grand Jury.

4. Between on or about October 1, 2000 and continuing to on or about April 30, 2001, the defendant **STEPHANIE BROOKS** obtained personal checks and identification documents stolen by a juvenile through thefts in a classroom.

5. Between on or about October 1, 2000 and continuing to on or about April 30, 2001, the defendant **FLORENCE BROOKS** obtained personal checks and identification documents stolen by a juvenile through thefts in a classroom.

6. Between on or about October 1, 2000 and continuing to on or about March 31, 2001, defendant **KEVA WADDLES** provided defendant **FLORENCE BROOKS** identification and account information on various individuals through her employment at Ducks Unlimited.

7. Between on or about October 1, 2000, and continuing to on or about April 24, 2001, defendants **TINA WADDLES, STEPHANIE BROOKS, TARA FLEMING, FLORENCE BROOKS**, and others known and unknown to the Grand Jury stole personal checks from mailboxes.

8. Between on or about October 1, 2000 and continuing to on or about April 30, 2001, defendants **NATOSHIA ALSTON, TARA FLEMING, PRECIOUS THOMPSON** and **TINA WADDLES** provided defendant **FLORENCE BROOKS** with identifying information to be used in the fraudulent passing of counterfeit and stolen checks.

9. Between on or about October 1, 2000 and continuing to on or about April 30, 2001, the defendant **TINA WADDLES** and persons known and unknown to the Grand Jury produced fraudulent identification for **APRIL LOGAN, TARA FLEMING, STEPHANIE BROOKS, HENRY PERDUE, FLORENCE BROOKS, TOYA MAXWELL**, and other persons known and unknown to the Grand Jury.

10. Between on or about October 1, 2000 and continuing to on or about April 30, 2001, the following individuals purchased and altered novelty identification from Blue Light Studios in order to pass counterfeit and stolen checks: **STEPHANIE BROOKS, FLORENCE BROOKS, DELORIS PAMPLEY, and LATRICE PEARSON.**

11. Between on or about October 16, 2000 and continuing to on or about October 18, 2000, the defendant **LATRICE PEARSON** received, possessed, and passed counterfeit securities produced by defendant **FLORENCE BROOKS.**

12. Between on or about October 18, 2000 and continuing to on or about October 19, 2000, the defendant **HENRY PERDUE** received, possessed, and passed counterfeit securities produced by defendant **FLORENCE BROOKS.**

13. On or about October 19, 2000, the defendant **STEPHANIE BROOKS** received, possessed, and passed counterfeit securities produced by defendant **FLORENCE BROOKS.**

14. Between on or about October 21, 2000 and continuing to on or about April 24, 2001, the defendant **FLORENCE BROOKS** sold counterfeit and stolen checks to and contracted with various individuals for the negotiating and passing of counterfeit and stolen checks at financial institutions and through various merchants in exchange for cash and merchandise.

15. Between on or about December 26, 2000 and continuing to on or about April 24, 2001, the defendants **NATOSHIA ALSTON, APRIL LOGAN, WILLIE HUDSON, HENRY PERDUE, TOYA MAXWELL, STEPHANIE BROOKS, ANJANET HUDSON, TINA WADDLES, FREDERICK JACKSON, DELORIS PAMPLEY,**

and **LATRICE PEARSON** negotiated and passed stolen and counterfeit checks with the assistance of defendants **FLORENCE BROOKS** and **TINA WADDLES**.

16. Between on or about October 21, 2000 and continuing to on or about April 24, 2001, the defendant **FLORENCE BROOKS** passed stolen checks at various merchants using fraudulent identification.

All in violation of Title 18, United States Code, Section 371.

**COUNTS TWO THROUGH SEVEN**

On or about the dates listed below, in the Western District of Tennessee, the defendants,

----- **LATRICE PEARSON, TINA WADDLES, and FLORENCE BROOKS**,-----  
being aided and abetted counseled and induced by one another and persons known and unknown to the Grand Jury, did knowingly make, utter, and possess a counterfeited security of the organization listed below, with the intent to deceive the organization and financial institutions, to wit,

<u>COUNT</u>	<u>DATE</u>	<u>CHECK</u>	<u>ORGANIZATION</u>
2	10/16/00	11969	NUTRA FORCE, INC.
3	10/18/00	5008	FAMILY DOLLAR STORES
4	10/19/00	11974	NUTRA FORCE, INC.
5	10/19/00	11977	NUTRA FORCE, INC.
6	10/19/00	11978	NUTRA FORCE, INC.
7	10/19/00	11988	NUTRA FORCE, INC.

All in violation of Title 18, United States Code, Sections 513(a) and 2.

COUNTS EIGHT THROUGH NINETEEN

On or about the dates listed below, in the Western District of Tennessee, the defendants,

----- HENRY PERDUE, TINA WADDLES, and FLORENCE BROOKS,-----  
being aided and abetted counseled and induced by one another and persons known and unknown to the Grand Jury, did knowingly make, utter, and possess a counterfeited security of the organization listed below, with the intent to deceive the organization and financial institutions, to wit,

<u>COUNT</u>	<u>DATE</u>	<u>CHECK</u>	<u>ORGANIZATION</u>
8	10/18/00	11969	NUTRA FORCE, INC.
9	10/19/00	5009	FAMILY DOLLAR STORES
10	10/19/00	5012	FAMILY DOLLAR STORES
11	10/19/00	5013	FAMILY DOLLAR STORES
12	10/19/00	5014	FAMILY DOLLAR STORES
13	10/19/00	11970	NUTRA FORCE, INC.
14	10/19/00	11971	NUTRA FORCE, INC.
15	10/19/00	11973	NUTRA FORCE, INC.
16	10/19/00	11975	NUTRA FORCE, INC.
17	10/19/00	11976	NUTRA FORCE, INC.

<u>COUNT</u>	<u>DATE</u>	<u>CHECK</u>	<u>ORGANIZATION</u>
18	10/19/00	11981	NUTRA FORCE, INC.
19	10/19/00	11982	NUTRA FORCE, INC.

All in violation of Title 18, United States Code, Sections 513(a) and 2.

COUNTS TWENTY THROUGH TWENTY-TWO

On or about the dates listed below, in the Western District of Tennessee, the defendants,

----- STEPHANIE BROOKS, PRECIOUS THOMPSON,-----  
----- and FLORENCE BROOKS,-----

being aided and abetted counseled and induced by one another and persons known and unknown to the Grand Jury, did knowingly make, utter, and possess a counterfeited security of the organization listed below, with the intent to deceive the organization and financial institutions, to wit,

<u>COUNT</u>	<u>DATE</u>	<u>CHECK</u>	<u>ORGANIZATION</u>
20	10/19/00	11983	NUTRA FORCE, INC.
21	10/19/00	11985	NUTRA FORCE, INC.
22	10/19/00	11984	NUTRA FORCE, INC.

All in violation of Title 18, United States Code, Sections 513(a) and 2.



COUNTS TWENTY-THREE THROUGH TWENTY-SEVEN

On or about the dates listed below in the Western District of Tennessee, the defendants,

----- HENRY PERDUE, TINA WADDLES, and FLORENCE BROOKS, -----  
being aided, abetted, counseled, and induced by one another and persons known and unknown to the Grand Jury, did knowingly use and attempt to use, without lawful authority, in a manner affecting interstate commerce, a means of identification of another, to wit: names, drivers license numbers, identification numbers, social security numbers, and bank account numbers, with the intent to commit forgery, that being a violation of Tennessee Code Annotated 39-14-114 and bank fraud, that being a violation of Title 18, United States Code, Section 1344,

<u>COUNT</u>	<u>DATE</u>	<u>IDENTIFICATION</u>	<u>CHECK</u>	<u>AMOUNT</u>
23	12/26/00	JACK ATKINS	2694	\$ 500.00
24	1/5/01	JEFFERY GRIFFIN	0643	\$2000.00
25	1/6/01	JEFFERY GRIFFIN	0852	\$2000.00
26	1/8/01	JEFF GRIFFIN	5403	\$2000.00
27	1/8/01	JEFF GRIFFIN	5406	\$2500.00

All in violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

COUNTS TWENTY-EIGHT THROUGH FORTY-TWO

On or about the dates listed below in the Western District of Tennessee, the defendants,

-----NATOSHIA ALSTON, TINA WADDLES, and FLORENCE BROOKS,-----  
being aided, abetted, counseled, and induced by one another and persons known and unknown to the Grand Jury, did knowingly use and attempt to use, without lawful authority, in a manner affecting interstate commerce, a means of identification of another, to wit: names, drivers license numbers, identification numbers, social security numbers, and bank account numbers, with the intent to commit forgery, that being a violation of Tennessee Code Annotated 39-14-114 and bank fraud, that being a violation of Title 18, United States Code, Section 1344,

<u>COUNT</u>	<u>DATE</u>	<u>IDENTIFICATION</u>	<u>CHECK</u>	<u>AMOUNT</u>
28	1/3/01	REGINA GRIFFIN	6542	\$1000.00
29	1/3/01	DAWN JARRETT	6528	\$ 750.00
30	1/4/01	REGINA GRIFFIN	6538	\$ 600.00
31	1/4/01	REGINA GRIFFIN	6539	\$1000.00
32	1/4/01	REGINA GRIFFIN	6540	\$1000.00
33	1/4/01	REGINA GRIFFIN	6541	\$1000.00
34	1/4/01	REGINA GRIFFIN	6543	\$1500.00
35	1/4/01	REGINA GRIFFIN	6544	\$1500.00
36	1/5/01	REGINA GRIFFIN	6549	\$2000.00
37	1/5/01	REGINA GRIFFIN	6550	\$2000.00
38	1/6/01	REGINA GRIFFIN	824	\$2000.00
39	1/6/01	REGINA GRIFFIN	856	\$2000.00
40	1/6/01	REGINA GRIFFIN	6408	\$2000.00
41	1/8/01	REGINA GRIFFIN	5402	\$2000.00
42	1/8/01	REGINA GRIFFIN	1226	\$2500.00

All in violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

COUNTS FORTY-THREE THROUGH FORTY-SEVEN

On or about the dates listed below in the Western District of Tennessee, the defendants,

----- TOYA MAXWELL, TINA WADDLES, AND FLORENCE BROOKS, -----  
being aided, abetted, counseled, and induced by one another and persons known and unknown to the Grand Jury, did knowingly use and attempt to use, without lawful authority, in a manner affecting interstate commerce, a means of identification of another, to wit: names, drivers license numbers, identification numbers, social security numbers, and bank account numbers, with the intent to commit forgery, that being a violation of Tennessee Code Annotated 39-14-114 and bank fraud, that being a violation of Title 18, United States Code, Section 1344,

<u>COUNT</u>	<u>DATE</u>	<u>IDENTIFICATION</u>	<u>CHECK</u>	<u>AMOUNT</u>
43	1/13/01	SANDIE COLEMAN	1083	\$ 500.00
44	1/13/01	SANDIE COLEMAN	1084	\$ 500.00
45	1/13/01	SANDIE COLEMAN	1086	\$ 500.00
46	1/16/01	SANDIE COLEMAN	1089	\$ 600.00
47	1/18/01	LORI ANNE SMITH	608	\$ 600.00

All in violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

COUNTS FORTY-EIGHT THROUGH FIFTY-THREE

On or about the dates listed below in the Western District of Tennessee, the defendants,

-----APRIL LOGAN, TINA WADDLES, and FLORENCE BROOKS,-----  
being aided, abetted, counseled, and induced by one another and persons known and unknown to the Grand Jury, did knowingly use and attempt to use, without lawful authority, in a manner affecting interstate commerce, a means of identification of another, to wit: names, drivers license numbers, identification numbers, social security numbers, and bank account numbers, with the intent to commit forgery, that being a violation of Tennessee Code Annotated 39-14-114 and bank fraud, that being a violation of Title 18, United States Code, Section 1344,

<u>COUNT</u>	<u>DATE</u>	<u>IDENTIFICATION</u>	<u>CHECK</u>	<u>AMOUNT</u>
48	1/14/01	CHARLOTTE BUTLER	2603	\$ 600.00
49	1/16/01	CHARLOTTE BUTLER	1153	\$ 600.00
50	1/16/01	CHARLOTTE BUTLER	1155	\$ 600.00
51	1/16/01	CHARLOTTE BUTLER	1156	\$ 600.00
52	2/5/01	CAROLE PAUKEN	115	\$ 600.00
53	2/6/01	CAROLE PAUKEN	116	\$ 500.00

All in violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

COUNT FIFTY-FOUR

On or about April 24, 2001, in the Western District of Tennessee, the defendants,

----- **ANJANET HUDSON, TINA WADDLES, and FLORENCE BROOKS,**-----  
being aided, abetted, counseled, and induced by one another and persons known and unknown to the Grand Jury, did knowingly use and attempt to use, without lawful authority, in a manner affecting interstate commerce, a means of identification for Betty Lusk, to wit: names, drivers license numbers, and, identification numbers, with the intent to commit forgery, that being a violation of Tennessee Code Annotated 39-14-114 and with the intent to pass, utter and publish a forged Treasury check in excess of \$11,000.00, that being a violation of Title 18, United States Code, Section 510(a)(2), all in violation of Title 18, United States Code, Section 1028(a)(7).

COUNT FIFTY-FIVE

On or about December 27, 2000, in the Western District of Tennessee, the defendants,

----**DELORIS PAMPLEY, TERRANCE STEVENSON, and FLORENCE BROOKS,**----  
being aided, abetted, counseled, and induced by one another and persons known and unknown to the Grand Jury, did knowingly use and attempt to use, without lawful authority, in a manner affecting interstate commerce, a means of identification for Angela Matthews,

to wit: her name and account number, with the intent to commit forgery, that being a violation of Tennessee Code Annotated 39-14-114, all in violation of Title 18, United States Code, Section 1028(a)(7).

**COUNT FIFTY-SIX**

Beginning on or about October 19, 2000 and continuing to on or about January 9, 2001, in the Western District of Tennessee, the defendants,

----- **HENRY PERDUE and FLORENCE BROOKS,**-----  
being aided, abetted, counseled, and induced by one another and persons known and unknown to the Grand Jury, knowingly and with intent to defraud effected and attempted to effect transactions with access devices issued to other persons; to wit: the bank account numbers of Shulton Rubin and Jeff Griffin, and by such conduct received and attempted to receive money and any other thing of value in excess of \$1,000.00, in violation of Title 18, United States Code, Sections 1029(a)(5) and 2.

COUNT FIFTY-SEVEN

Beginning on or about October 20, 2000 and continuing to on or about October 21, 2000, in the Western District of Tennessee, the defendants,

----- LATRICE PEARSON and FLORENCE BROOKS,-----  
being aided, abetted, counseled, and induced by one another and persons known and unknown to the Grand Jury, knowingly and with intent to defraud effected and attempted to effect transactions with access devices issued to another person; to wit: the bank account number of Alicia Benefield, and by such conduct received money and any other thing of value in excess of \$1,000.00, in violation of Title 18, United States Code, Sections 1029(a)(5) and 2.

COUNT FIFTY-EIGHT

Beginning on or about December 24, 2000 and continuing to on or about January 4, 2001, in the Western District of Tennessee, the defendants,

-----STEPHANIE BROOKS, TARA FLEMING and FLORENCE BROOKS,-----  
being aided, abetted, counseled, and induced by one another and persons known and unknown to the Grand Jury, knowingly and with intent to defraud effected and attempted to effect transactions with access devices issued to other persons; to wit: the bank

account numbers of Tara Fleming and Slater Lowery, and by such conduct received money and any other thing of value in excess of \$1,000.00, in violation of Title 18, United States Code, Sections 1029(a)(5) and 2.



COUNT FIFTY-NINE

Beginning on or about January 3, 2001 and continuing to on or about January 5, 2001, in the Western District of Tennessee, the defendants,

----- NATOSHIA ALSTON and FLORENCE BROOKS,-----

being aided, abetted, counseled, and induced by one another and persons known and unknown to the Grand Jury, knowingly and with intent to defraud effected and attempted to effect transactions with access devices issued to other persons; to wit: the bank account numbers of Slater Lowery, Dawn Jarrett, and Kristy Styers, and by such conduct received money and any other thing of value in excess of \$1,000.00, in violation of Title 18, United States Code, Sections 1029(a)(5) and 2.

A TRUE BILL:

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Grand Jury Foreperson

DATE:

February 27, 2002

Asst. Laurence J. Kennedy  
UNITED STATES ATTORNEY